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April 14, 2005

Ref: 8EPR-N

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, D.C. 20426

Re: Entrega Pipeline Project , DEIS Review 20050082
FERC Docket No. CP04-413-000

Dear Ms. Salas:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, Region 8 of the Environmental Protection Agency (EPA) has reviewed and rated the *Draft Environmental Impact Statement (DEIS) for the Entrega Pipeline Project*, dated February 2005. The project is a 327 mile long natural gas pipeline from Meeker, Colorado north to Wamsutter, Wyoming and east along I-80 to the Cheyenne Hub. The 36- and 42-inch diameter pipeline will include three new compressor stations, valve and metering facilities, and associated access roads and power lines.

Based on the procedures EPA uses to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS, the project will be listed in the Federal Register in the category EC-2 (EC - Environmental Concerns, 2 - Insufficient Information). This rating means that the review identified environmental impacts that should be avoided in order to fully protect the environment and the DEIS does not contain sufficient information to thoroughly assess environmental impacts that should be avoided to fully protect the environment.

EPA's concerns with the project are the impacts to ecosystems in northwestern Colorado and northeastern Utah (Piceance and Uinta Basins) from actions connected to or induced by the Entrega Pipeline. Of particular concern are:

- loss of wildlife habitat,
- habitat fragmentation,
- erosion reducing water quality,
- soil loss
- invasive and noxious weeds and
- air quality (regionally).

Increased gas transportation capacity will facilitate increased density and intensity of gas development. Increased transportation capacity will also increase the rate of gas development. The FEIS should examine the indirect environmental impacts associated with increasing capacity for natural gas transportation and identify mitigation that will be implemented to reduce these impacts. Although the Entrega DEIS did include a section on the cumulative impacts of oil and

gas in the Piceance Basin, the analysis did not identify the indirect impacts that will be induced by increasing gas transportation capacity nor was any mitigation identified for impacts other than the impacts directly resulting from construction of the pipeline. Information is available on some of the indirect impacts from BLM's environmental analysis of oil and gas development. However, it appears that the environmental impacts from oil and gas development have not been analyzed in a holistic manner for the area resulting in segmentation of the environmental analysis. The Roan Plateau DEIS is the most recent BLM environmental analysis for gas development. Unfortunately the Roan Plateau analysis only covers a small area that will be feeding into the proposed Entrega pipeline and does not include increased leasing resulting from additional pipeline capacity. Similarly, the Vernal Utah Field office is completing a Resource Management Plan which will look at some of the impacts of gas development in the Uinta Basin.

We recommend that the FEIS be revised to include the proposed Wyoming Interstate Gas (WIG) pipeline from Meeker to Wamsutter as a stand-alone alternative. In this manner, FERC could take a more direct approach in evaluating whether or not it is beneficial to the public to have one or two pipelines in the same corridor. It would also appear to be more efficient for the federal government (BLM and FERC) to rely on one EIS. Little to no additional environmental analysis would be needed in the FEIS for a stand-alone WIG alternative, as the pipeline corridors are almost exactly the same and an alternative has been developed in the DEIS for constructing both pipelines in the same corridor. With these few additions, the FEIS could evaluate which alternative has the least environmental impacts and best meets the public need for natural gas (Entrega pipeline, WIG pipeline or both pipelines).

We are also concerned by the segmenting of several pipeline projects currently proposed in the Piceance Basin. Many of these pipelines and other facilities appear to be "interdependent parts of a larger action and depend on the larger action for their justification" as discussed in the CEQ regulations regarding connected actions at 40 CFR 1508.25 (a)(1)(iii). The overall need for the project appears to be to construct facilities to increase natural gas production and transportation from northeastern Utah and northwestern Colorado to national markets.

In addition to the Wyoming Interstate Gas pipeline from Meeker to Wamsutter (mentioned above), there is a proposal by Entrega parent company EnCana to build a 205 mile long pipeline from the Utah/Colorado border and southwest of the proposed Roan Plateau development to a new gas plant in Meeker near the termini of the Entrega pipeline (the Meeker Hub compression station). The BLM is currently seeking public comment on an Environmental Assessment for the "Meeker Pipeline and Gas Plant Project". Encana/Entrega also have other pipeline proposals as described in Figure 3.12-1 and Table 3.12-1 in the DEIS on pages 3-137 and 3-138 of the EIS connecting the last few miles between the Meeker gas plant and the Meeker Hub compression station. It appears that the federal government has a major role in permitting/approving these pipelines. EnCana/Entrega pipelines are being routed through the Meeker area to use the additional capacity that will be provided by the proposed Entrega and Wyoming Interstate Gas pipelines and to market gas from EnCana's recently acquired gas development properties (page 1-3, DEIS). We recommend that the EIS be revised to look at all the interconnected natural gas transportation projects in the area and the additional natural gas development that will be induced by increasing pipeline capacity.

If you have any questions about these comments, please contact Dana Allen at (303) 312-6870.
We appreciate your interest in our comments.

Sincerely,

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Larry Svoboda, Director
NEPA Program
Ecosystem Protection and Remediation

Enclosure

cc: Gas Branch1, JPJ11.1, FERC
Cliff Rader, EPA HQ